

Telecommunications Act of 1996		7253-U Staff Recommendation on SGATC
<p>251 (b)(1) Resale.—The duty not to prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of its telecommunications services.</p>		<p>BellSouth's Statement is consistent with the Commission's prior rulings. Intervenors oppose the restrictions on resale, but these restrictions were approved by the Commission in its arbitration rulings and in Docket No. 6352-U. <i>This aspect of the Statement regarding restrictions on resale appears acceptable to the Staff - take effect.</i></p>
<p>251 (b)(2) Number Portability.—The duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.</p>		<p>The rates for interim number portability are interim, subject to true-up. Establishing rates on a general basis, similar to a tariff, as a part of a Statement may violate the law against retroactive ratemaking. Also, the Commission has not ruled that these interim rates are cost-based. <i>As a matter of policy, if not law, the Staff recommends rejection based upon the interim nature of the rates subject to true-up, and because the Commission has not determined the rates to be cost-based.</i></p>
<p>251 (b)(3) Dialing Parity.—The duty to provide dialing parity to competing providers of telephone exchange service and telephone toll service, and the duty to permit all such providers to have nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays.</p>		<p>Evidence at the hearing suggested that, at least in the recent past, CLECs have had some difficulty in obtaining nondiscriminatory access to telephone numbers. In addition, BellSouth has not yet provided an electronic interface for directory listings; the Commission required BST to set this up by April 1, 1997. Some CLECs raised concern that the Statement does not contain sufficient detail to document procedures and to demonstrate compliance with this statutory provision. <i>This is one of the concerns supporting Staff's recommendation of rejection.</i></p>
<p>251 (b)(4) Access to Rights-of-Way.—The duty to afford access to the poles, ducts, conduits, and rights-of-way of such carrier to competing providers of telecommunications services on rates, terms, and conditions that are consistent with section 224.</p>		<p>The rates for access to rights-of-way are interim, subject to true-up. In addition, these rates were not established or approved by the Commission in the arbitration cases. <i>The Staff has the same concern stated above, about the interim nature of the rates subject to true-up. In addition, there is even less basis to consider these rates cost-based since they were never addressed in the arbitrations. - Rejection</i></p>

<p>251 (b)(5) Reciprocal Compensation.—The duty to establish reciprocal compensation arrangements for the transport and termination of telecommunications.</p> <p>[Pricing for reciprocal compensation is also addressed in Section 252(d)(2).]</p>	<p>These rates are interim, subject to true-up. In addition, in the arbitrations, the Commission did not rule that these rates are cost-based; that is the purpose of Docket No. 7061-U.</p> <p>Some intervenors also objected that the rate structure is contrary to the FCC's pricing rule for transport and termination.</p> <p><i>Consistent with the Staff's position stated above, the Staff recommends rejection because of the interim nature of the rates subject to true-up, and because the Commission has not determined these rates to be cost-based.</i></p> <p><i>The Staff is not recommending that the Commission reconsider the rate structure for these rates.</i></p>
<p>251 (c)(1) Duty to Negotiate. - The duty to negotiate in good faith in accordance with section 252 the particular terms and conditions of agreements to fulfill the duties described in paragraphs (1) through (5) of subsection (b) and this subsection. The requesting telecommunications carrier also has the duty to negotiate in good faith the terms and conditions of such agreements.</p>	<p>Intermedia raised numerous questions at the hearing regarding BellSouth's negotiations. However, ICI did not appear to ask for rejection of the Statement upon those grounds. Many other companies have negotiated agreements, and the arbitrations to date have not proven bad faith on the part of BellSouth. <i>The Staff does not base its rejection recommendation upon any concern about BellSouth's good faith in negotiations. — As to this item, take effect.</i></p>

<p>251 (c)(2) Interconnection— The duty to provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network— (A) for the transmission and routing of telephone exchange service and exchange access; (B) at any technically feasible point within the carrier's network; that is at least equal in quality to that provided by the local exchange carrier to itself or to any subsidiary, affiliate, or any other party to which the carrier provides interconnection; and (D) on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms and conditions of the agreement and the requirements of this section and section 252.</p>	<p>Intervenors raised objections based upon collocation, and upon the lack of electronic interfaces for operational support systems. These items are addressed in other items on this matrix; the concerns relate to the need to finish procedures to make physical collocation actually available, to provide collocation on a nondiscriminatory basis, to include all relevant provisions within the Statement rather than in a separate "handbook," and to establish cost-based rates that will no longer be subject to true-up.</p> <p><i>As explained in the other items, primarily the concerns regarding collocation, these concerns support the Staff's recommendation of rejection.</i></p>
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<p>251 (c)(3) Unbundled Access.— The duty to provide, to any requesting telecommunications carrier for the provision of a telecommunications service, nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory in accordance with the terms and conditions of the agreement and the requirements of this section and section 252. An incumbent local exchange carrier shall provide such unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide such telecommunications service.</p>	<p>Intervenors raised several objections regarding this item. The major ones are: (1) Lack of nondiscriminatory access via electronic interfaces to operational support systems (OSS); (2) lack of performance standards, demonstrable measures of quality (DMOQs), and incentives that would ensure nondiscriminatory access to unbundled network elements; and (3) inability to combine (“rebundle”) unbundled elements to provide services without having that treated as “resale.”</p> <p><i>The Staff agrees that the first two of the objections listed above are significant flaws in the Statement, warranting its rejection. The Statement cannot “generally offer” nondiscriminatory access when it is not actually available; this may be available on April 1, or may not be available until December 31; the Commission should review the OSS interfaces as developed to determine this. In addition, testing has not yet demonstrated that unbundled elements can be actually provided without errors or undue delays. The Statement should also contain appropriate performance standards so that nondiscriminatory access can be measured and verified.</i></p>
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<p>251 (c)(4) Resale.---The duty-- (A) to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers; and (B) not to prohibit, and not to impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications service, except that a State commission may, consistent with regulations prescribed by the Commission under this section, prohibit a reseller that obtains at wholesale rates a telecommunications service that is available at retail only to a category of subscribers from offering such service to a different category of subscribers.</p>	<p>BellSouth's Statement regarding this item is consistent with the Commission's prior rulings in the arbitrations and in Docket No. 6352-U. Although the discount is interim, it is not subject to true-up, and the Commission found it to be based on appropriate evidence of costs (avoided costs) pursuant to Section 251(c)(4), in Docket No. 6352-U.</p> <p>However, BellSouth's interfaces for resellers to access operational support systems (OSS) are only interim, and do not yet appear to provide nondiscriminatory access.</p> <p>Intervenors also oppose some other aspects regarding resale, but they are objecting to (1) the Commission's prior rulings, and (2) the interim nature of the discount, even though it is cost- based and there is no true-up.</p> <p><i>The Staff's rejection recommendation as to this part of the Statement is based on the lack of nondiscriminatory access to the operational support systems (OSS) necessary for resale. The electronic interfaces have not been developed; compliant interfaces will not be available until either March 31, 1997, or possibly December 31, 1997. The Commission should evaluate these interfaces when they are developed, to verify that they provide nondiscriminatory access in compliance with Section 251(c)(4).</i></p> <p><i>The remaining aspects of this portion of the Statement appear acceptable to the Staff.</i></p>
<p>251 (c)(5) Notice of Changes. The duty to provide reasonable public notice of changes in the information necessary for the transmission and routing of services using that local exchange carrier's facilities or networks, as well as of any other changes that would affect the interoperability of those facilities and networks.</p>	<p>The Statement reflects terms and conditions that were established pursuant to negotiation and arbitration in the AT&T and MCI arbitration cases, Dockets No. 6801-U and 6865-U.</p> <p><i>The Staff does not base its rejection recommendation upon any concern about BellSouth's notice of these changes. Therefore, this portion of the Statement should be permitted to take effect.</i></p>

<p>251(c)(6) Collocation.— The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State commission that physical collocation is not practical for technical reasons or because of space limitations.</p>	<p>The physical collocation rates are interim, subject to true-up. Also, the Commission has not found them to be cost-based (and has not reviewed them under the Section 251(c)(6) standard to determine whether they are just, reasonable, and nondiscriminatory.</p> <p>In addition, intervenors objected that physical collocation has not yet been provided, BST's procedures for that are still being developed, and the provisioning intervals do not appear to be nondiscriminatory.</p> <p>The virtual collocation rates are based upon tariffs, and the Commission has not found them to be cost-based (and has not reviewed them under the Section 251(c)(6) standard to determine whether they are just, reasonable, and nondiscriminatory.</p> <p>Many terms of collocation are not in the SGAT, but in BellSouth's "Negotiations Handbook" which BellSouth can change unilaterally.</p> <p><i>Consistent with the Staff's position stated above, the Staff recommends rejection because of the interim nature of the rates subject to true-up, and because the Commission has not determined these rates to be cost-based (or otherwise consistent with the price standard of Section 251(c)(6). Other reasons for rejection are that the terms in the Negotiations Handbook should be in the SGAT, if the Commission finds them acceptable; and that the ability to provide physical collocation is still in the developmental stage and appears not to be currently available on a nondiscriminatory basis.</i></p>
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<p>251 (d)(2) Access Standards.-- In determining what network elements should be made available for purposes of subsection (c)(3), the Commission shall consider, at a minimum, whether (A) access to such network elements as are proprietary in nature is necessary; and (B) the failure to provide access to such network elements would impair the ability of the telecommunications carrier seeking access to provide the services that it seeks to offer.</p>	<p>This has not been an issue in this case. This provision of the Act speaks to the FCC, not to the Georgia Commission. Therefore, this provision has no bearing on whether to approve, reject, or allow the Statement to take effect.</p>
<p>251 (d)(3) Preservation of State Access Regulations.-- In prescribing and enforcing regulations to implement the requirements of this section, the Commission shall not preclude the enforcement of any regulation, order, or policy of a State commission that— (A) establishes access and interconnection obligations of local exchange carriers; (B) is consistent with the requirements of this section; and (C) does not substantially prevent implementation of the requirement of this section and the purposes of this part.</p>	<p>This has not been an issue in this case. This provision of the Act speaks to the FCC, not to the Georgia Commission. Therefore, this provision has no bearing on whether to approve, reject, or allow the Statement to take effect.</p>
<p>251 (e)(1) Commission Authority and Jurisdiction.— The Commission shall create or designate one or more impartial entities to administer telecommunications numbering and to make such numbers available on an equitable basis. The Commission shall have exclusive jurisdiction over those portions of the North American Numbering Plan that pertain to the United States. Nothing in this paragraph shall preclude the Commission from delegating to State commissions or other entities all or any portion of such jurisdiction.</p>	<p>This has not been an issue in this case. This provision of the Act speaks to the FCC, and has not been presented as an issue in this case. Therefore, this provision has no bearing on whether to approve, reject, or allow the Statement to take effect.</p>

<p>251 (g) Continued Enforcement of Exchange Access and Interconnection Requirements.---</p> <p>On and after the date of enactment of the Telecommunications Act of 1996, each local exchange carrier, to the extent that it provides wireline services, shall provide exchange access, information access, and exchange services for such access to interexchange carriers and information service providers in accordance with the same equal access and nondiscriminatory interconnection restrictions and obligations (including receipt of compensation) that apply to such carrier on the date immediately preceding the date of enactment of the Telecommunications Act of 1996 under any court order, consent decree, or regulation, order, or policy of the Commission, until such restrictions and obligations are explicitly superseded by regulations prescribed by the Commission after such date of enactment. During the period beginning on such date of enactment and until such restrictions and obligations are so superseded, such restrictions and obligations shall be enforceable in the same manner as regulations of the Commission.</p>	<p>This has not been an issue in this case. This provision speaks to the continued obligation of LECs to provide IXCs with exchange access, information access, and exchange services for such access. This has not been presented as an issue in this case. Therefore, this provision has no bearing on whether to approve, reject, or allow the Statement to take effect.</p>
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<p>252 (d)(1) Interconnection and Network Element Charges --- Determinations by a State commission of the just and reasonable rate for the interconnection of facilities and equipment for the purposes of subsection (c)(2) of section 251, and the just and reasonable rate for network elements for purposes of subsection (c)(3) of such section -- (A) shall be --- (i) based on the cost (determined without reference to a rate-of-return or other rate-based proceeding) of providing the interconnection or network element (whichever is applicable), and (ii) nondiscriminatory, and (B) may include a reasonable profit.</p>	<p>The rates for interconnection (which includes collocation) and unbundled network elements are interim, subject to true-up, and were set according to the arbitrations where the Commission did not determine them to be cost-based in accordance with Section 252(d)(1).</p> <p>Some intervenors also objected because the price for unbundled elements, when recombined ("rebundled") as local service without adding CLEC facilities, becomes the "resale" price. However, in this regard the Statement is consistent with the Commission's arbitration rulings (see AT&T, Docket No. 6801-U).</p> <p><i>The Staff agrees with the first statement; consistent with its concerns expressed above, the Staff recommends rejection because of the interim nature of the rates subject to true-up, and because the Commission has not determined these rates to be cost-based</i></p>
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252 (d)(2) Charges for Transport and Termination of Traffic —

(A) In General —For the purposes of compliance by an incumbent local exchange carrier with section 251(b)(5), a State commission shall not consider the terms and conditions for reciprocal compensation to be just and reasonable unless—

(i) such terms and conditions provide for the mutual and reciprocal recovery by each carrier of costs associated with the transport and termination on each carrier's network facilities of calls that originate on the network facilities of the other carrier; and

(ii) such terms and conditions determine such costs on the basis of a reasonable approximation of the additional costs of terminating such calls.

(B) Rules of Construction. - This paragraph shall not be construed—

(i) to preclude arrangements that afford the mutual recovery of costs through the offsetting of reciprocal obligations, including arrangements that waive mutual recovery (such as bill-and-keep arrangements); or

(ii) to authorize the Commission or any State commission to engage in any rate regulation proceeding to establish with particularity the additional costs of transporting or termination calls, or to require carriers to maintain records with respect to the additional costs of such calls.

The Statement's rates for transport and termination of traffic are interim, subject to true-up. In addition, they were taken from the arbitrations where the Commission did not determine them to be cost-based in accordance with Section 252(d)(2).

Some intervenors also objected that the rate structure is contrary to the FCC's pricing rule for this item (which has been stayed).

The Staff agrees with the first two statements; consistent with the concerns expressed previously, the Staff recommends rejection because of the interim nature of the rates subject to true-up, and because the Commission has not determined these rates to be cost-based.

The Staff is not recommending that the Commission reconsider the rate structure for these rates; that issue is likely to be before the Commission in the cost study proceeding, Docket No. 7061-U.

<p>252 (d)(3) Wholesale Prices for Telecommunications Services . --- For the purposes of section 251(c)(4), a State commission shall determine wholesale rates on the basis of retail rates charged to subscribers for the telecommunications service requested, excluding the portion thereof attributable to any marketing, billing, collection, and other costs that will be avoided by the local exchange carrier.</p>	<p>These rates are interim, but are not subject to true-up. The discounts are taken from Docket No. 6352-U wherein the Commission did find them to be based upon avoided costs, consistent with Section 252(d)(3). (The discounts were affirmed in the arbitrations, without needing any additional review of the cost basis for the discounts.)</p> <p>Intervenors also objected to the lack of discount applied to resale of contract service arrangements (CSAs), although this is pursuant to the Commission's rulings in the arbitrations (see AT&T, Docket No. 6801-U). <i>This aspect of the Statement appears acceptable to the Staff.</i></p> <p><i>Therefore, the wholesale discount portion of the Statement may be allowed to take effect (noting that the Commission plans to review the discount in a subsequent docket, so any prospective revision should be reflected in any Statement in the future).</i></p>
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FILED

MAR 25 1997

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

COURT CLERK'S OFFICE - CKC
CORPORATION COMMISSION
OF OKLAHOMA

APPLICATION OF ERNEST G. JOHNSON,)
DIRECTOR OF THE PUBLIC UTILITY)
DIVISION, OKLAHOMA CORPORATION)
COMMISSION TO EXPLORE THE)
REQUIREMENTS OF SECTION 271 OF)
THE TELECOMMUNICATIONS ACT OF 1996.)

Cause No. PUD 970000064

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.
SUBMISSION OF REBUTTAL STATEMENT OF NANCY DALTON

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and submits the attached Rebuttal Statement of its witness, Nancy Dalton, in relation to the Commission's consideration of the above-referenced Application to Explore the Requirements of Section 271 of the Telecommunications Act of 1996 ("FTA"). AT&T's Statement is filed in compliance with the Commission Order No. 409904 issued on February 28, 1997.

Respectfully submitted,

WHITE, COFFEY, GALT & FITE, P.C.

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ATTORNEYS FOR AT&T COMMUNICATIONS
OF THE SOUTHWEST, INC.

CERTIFICATE OF MAILING

This is to certify that on this 25th day of March, 1997, a true and correct copy of the above and foregoing AT&T COMMUNICATIONS OF THE SOUTHWEST, INC. SUBMISSION OF REBUTTAL STATEMENT OF NANCY DALTON was mailed, postage prepaid to:

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Jack P. Fite

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF ERNEST G.	§	
JOHNSON, DIRECTOR OF THE	§	
PUBLIC UTILITY DIVISION,	§	
OKLAHOMA CORPORATION	§	Cause No. PUD 970000064
COMMISSION TO EXPLORE THE	§	
REQUIREMENTS OF SECTION 271	§	
OF THE TELECOMMUNICATIONS	§	
ACT OF 1996.	§	

**REBUTTAL STATEMENT OF NANCY DALTON
ON BEHALF OF
AT&T COMMUNICATIONS OF THE SOUTHWEST**

I. INTRODUCTION AND PURPOSE

1. My name is Nancy Dalton. I am the same Nancy Dalton who filed a statement on behalf of AT&T Communications of the Southwest, Inc. (AT&T) in this proceeding.

2. I have reviewed the initial comments filed by Southwestern Bell Telephone Company - Oklahoma (SWBT). I also have reviewed the draft affidavits of Elizabeth A. Ham, Richard Keener, Nancy Lowrance regarding SWBT's alleged compliance with Section 271 of the Telecommunications Act of 1996 (the Act) with respect to nondiscriminatory access to operations support systems (OSS).

3. The purpose of my rebuttal statement is to provide updated information regarding AT&T's and SWBT's progress, or lack thereof, regarding unbundled network elements (UNE) and UNE operation support systems. As I indicated in my original statement filed with this Commission, the OSS negotiations, design, implementation, and testing is still in process. Therefore, it is important for this Commission to obtain the most updated information regarding the status of this issue.

II. SIGNIFICANT IMPLEMENTATION PROBLEMS CURRENTLY EXIST.

A. Negotiations for OSSs for Unbundled Network Elements Remain at a Standstill.

4. As I stated in my original Statement, AT&T has aggressively sought reliable and efficient OSS for unbundled network elements. As of the time that my affidavit was filed, I was still hopeful that negotiations, although slow, might result in future nondiscriminatory access to OSS for UNEs. However, since that time, I am now extremely doubtful that negotiations will result in any further movement by SWBT to implement proper and effective OSSs for UNEs.

5. Through a series of letters with SWBT negotiators, it has become apparent to me that SWBT is unwilling to consider implementation of OSSs for UNEs in any other fashion than as "special or design services." As is explained in my original Statement and in the Joint Statement of Steven Turner and Robert Falcone, SWBT insists on making UNEs available only as "special or design services," which essentially dooms the competitive viability of UNEs, and, therefore, facilities-based competition in the local market.

6. SWBT's position has not changed and, in fact, appears to have hardened. As a result, AT&T is and remains very concerned about its ability to provide service to customers through UNE when a customer has existing service and AT&T namely wants to migrate the customer, as is, with no change to the physical serving arrangement. I expressed my concerns to Mr. Gary Juhl, Director - Competitive Assurance, SWBT, in a letter dated March 13, 1997, in which I stated:

... With a clearer understanding of the "special design services" process, AT&T remains very concerned about its abilities to provide service to customers though UNE when a customer has existing service. These concerns center around the interruption of service that customers will experience, the elongated installation and repair/maintenance intervals quoted for special services, the loss of the real-time capabilities to obtain due dates and schedule appointments for dispatch, and the additional expenses associated with provisioning special test points as proposed by SWBT.

7. Because the UNE negotiations at the Core Team level have reached an impasse, I have suggested that critical policy issues be escalated to and addressed by the Leadership Teams. Therefore, as of this time, we have made no further progress in the negotiations, much less begun any implementation, of OSSs for UNEs.

B. SWBT's Latest Status Report for Electronic Interfaces Shows that the OSS Functions are not Operationally Ready.

8. In my original statement, I provided this Commission with copies of the status reports that SWBT, AT&T and MCI filed with Texas Public Utility Commission. *See* Statement of Nancy Dalton, Exhibits ND-3, 4, and 5. The status of negotiations in Texas is relevant to the Oklahoma proceeding since the OSS negotiation and implementation issues for Oklahoma will be the same. On March 17, 1997, SWBT filed its own status report in Texas on Electronic Implementations. A copy of SWBT's report is attached to this statement as Exhibit ND-10.

9. As can be seen from SWBT's most recent report, even SWBT admits that development work is not complete on several functions for pre-ordering, ordering and provisioning, and billing for resale. For example, SWBT has not completed internal testing on Resale OSS functions, such as Directory Listing Changes and new connects -- both single and multi-line, change orders.

10. The status reports, which are intended to reflect the detailed implementation of OSSs

in Texas. paint a far different picture than that presented by SWBT in the draft affidavits presented by SWBT to the Oklahoma Corporation Commission concerning OSSs. Unlike the February 28, 1997, joint status report, SWBT filed this latest report without consultation with AT&T. As a result, AT&T filed a response to the SWBT report noting that the parties were still very far apart in the negotiations on UNE OSSs notwithstanding specific clarification by the Texas Commission on March 5. *See*, AT&T Response to SWBT Status Report, dated March 21, 1997, attached as Exhibit ND-11.

11. Therefore, as of the time that I am filing this rebuttal statement, I maintain my conclusion that the required OSS functionality, particularly for UNEs, as required by the Federal Act and FCC Orders, are not operationally ready. Additional testing and implementation issues must be completed for Resale OSSs before these interfaces can be considered operationally ready. Significant negotiations, development, design, implementation, and testing must be completed before the UNE OSSs are operational ready. Until SWBT can establish that it has electronic interfaces for Resale and UNEs that will support AT&T's and other competitive local exchange carrier's anticipated volumes of transactions, then SWBT should not be allowed to enter the interLATA market.

12. Entry will occur first via resale and the UNE platform. Both involve what should be software-based changes. However, rather than working to make this happen for UNE, SWBT is working to make it not happen, doing all it can to make what should be a simple process complicated -- for competitors and customers.

VERIFICATION

STATE OF TEXAS

§

COUNTY OF

Dallas

§

I, NANCY DALTON, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement; and the information contained in the foregoing statement is true and correct to the best of my knowledge and belief.

Nancy M. Dalton
Nancy Dalton
AT&T

SUBSCRIBED AND SWORN TO BEFORE ME this 2nd day of March, 1997.

Judith Smith Oglesby
Notary Public

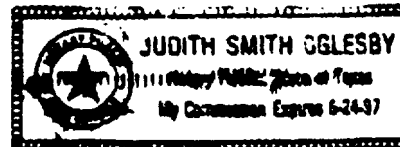


Exhibit ND-10
11 Pages

EXHIBIT ND-10

**SOUTHWESTERN BELL TELEPHONE COMPANY MARCH 17, 1997
REPORT TO TEXAS PUBLIC UTILITY COMMISSION ON
STATUS OF REAL-TIME ELECTRONIC INTERFACES**

Southwestern Bell

March 17, 1997

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PUC
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Merrie M. Cavanaugh
Attorney

Ms. Paula Mueller
Secretary of the Commission
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78701

Re: Docket Nos. 16189, 16196, 16226, 16285 and 16290

Dear Ms. Mueller:

Enclosed for filing is the original and thirty (30) copies of Southwestern Bell Telephone Company's ("SWBT") March Progress Report for Electronic Interfaces. In filing this report as required by Award paragraph 25, SWBT does not waive any legal arguments that the Arbitration Award, associated orders and resulting "Agreements" are in whole or in part, unlawful, and SWBT has reserved its right to appeal or seek review of the actions of Texas or federal legislative bodies, courts, or regulatory agencies of competent jurisdiction.

Sincerely,



Merrie M. Cavanaugh
Attorney

Enclosures

cc: Honorable Kathleen Hamilton, Administrative Law Judge, PUC
(hand delivered)
Bill Magness, Office of Policy Development, PUC (hand delivered)
Vicki Oswalt, Office of Policy Development, PUC (hand delivered)
Carole Vogel, Office of Regulatory Affairs, PUC (hand delivered)
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**SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR RESALE SERVICES**

FUNCTION (from AT&T Exhibit 15A)	SWBT AVAILABILITY (from AT&T Exhibit 15A) ¹	SWBT STATUS REPORT AS OF MARCH 15, 1997
		RESALE
PRE-ORDER		
Address Verification	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Service/Features Availability	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Dispatch Schedule	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Due Date	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. ²
Customer Service Record (CSR)	1/1/97C	Development of this functionality is complete for non-complex services. SWBT internal testing completed. Ready for testing by LSPs. ² Complex CSR functionality will be complete by 4/15/97. Enhanced development continues to provide additional fields by 5/1/97. Additional fields include IDENT, SA, LIST,

¹ AT&T and SWBT are working cooperatively to implement the functionality required for the pre-ordering and ordering/provisioning interfaces by June 1, 1997 with testing capabilities available April, 1997. AT&T and SWBT are focusing on these interface availability dates in totality as opposed to the individual functionality dates in this column.

² "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBI/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

		SIC and BILL.
POTS ORDERING & PROVISIONING		
Migration (Convert Customer As Is)	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
Migration With Changes (Convert with changes)	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Class Features	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Blocking (1+, 0+, 011)	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- PIC and PIC Freeze	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Essential Lines	1/1/97	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Add/Disc Additional Lines	1/1/97C	Development of this functionality is complete. SWBT internal testing completed Ready for testing by LSPs. ^{2,3,4} S&E recap must be supplied by LSP.
- Directory Listing Changes	2/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. ³ EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
Partial Migration (Line/WTN vs. Account Level)	4/1/97- 7/1/97T	Business Scenarios are same as full migrations. Development is in progress. ^{3,4}

²"Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBE/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

³ On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

⁴SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature code will be defined by SWBT.